REMARKS

Claims 1, 2, 8-10, and 12, of which claims 1, 2, and 12 are independent, are currently pending in this application. By this amendment, claims 1, 2, and 8-10 are amended, new claim 12 is added, and claims 3-7 and 11 are canceled without prejudice. Support for the amendments is found in the specification, including the claims, as filed. No new matter has been introduced. Favorable reconsideration of the application in light of the foregoing amendments and following comments is respectfully solicited.

Telephone Interview of August 6, 2009

Applicant thanks the Examiner for conducting a telephone interview with the undersigned. In the interview, it was agreed that further clarification of the previously presented phrase "one of the structures of the plasma display panel" should clarify the distinction between the claimed subject matter and the cited art.

Rejections Under 35 U.S.C. §§ 102 and 103(a)

In section 2 of the Office Action, claim 1 was rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent App. Pub. No. 2002/0016075 (Peng). In section 4 of the Office Action, claim 2 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Peng in view of JP Patent App. Pub. No. S59-143324 (Ashida) and U.S. Patent App. Pub. No. 2002/0195940 (Asano). In section 5 of the Office Action, claims 3-7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Peng in view of Asano. In section 6 of the Office Action, claims 8-11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Peng in view of Asano and U.S. Patent App. Pub. No. 2003/0090205 (Kang). Applicant respectfully traverses.

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I. Peng does not disclose or suggest moving a photomask between successive exposures of a portion of a photosensitive material corresponding to one of the structures of the plasma display panel.

Claim 1 recites, *inter alia*, "a position on a photosensitive material corresponding to one of the structures is exposed twice using successive first and second exposures . . . and <u>a</u> photomask and the photosensitive material are moved relative to each other . . . between the first and second exposures." Claims 2 and 12 each recite, *inter alia*, "a position on a photosensitive material corresponding to one of the electrodes is exposed twice using successive first and second exposures . . . and <u>a photomask and the photosensitive material are moved relative to</u> each other . . . between the first and second exposures."

Peng only vaguely discloses that multiple exposes may be performed, and does not disclose or suggest movement of a photomask between successive exposures of the same portion of photoresist. Instead, the use of multiple exposures appears to be for a case in which a single pulse of the laser is not sufficient "to properly anneal and crystallize the amorphous ITO layer" (Peng, paragraph [0023]). *See also* Peng, paragraph [0002] (explaining the "invention relates . . . to a method of crystallizing the transparent electrode of ITO."). Thus, even where Peng may suggest performing multiple exposures of the same region of photoresist, it does not suggest movement of a photomask between those exposures. Thus, Peng does not anticipate or render obvious the claimed subject matter.

II. Asano does not disclose or suggest movement of a photomask between successive first and second exposures of a portion of a photosensitive material

Section 4 of the Office Action asserts that in view of Asano's disclose of address electrodes formed at a pitch, the cited art would have rendered obvious movement of a photomask by multiple cycles of periodicity between successive exposures. However, although Asano discloses address electrodes formed at a particular pitch, Asano does not suggest (1) the

use of multiple exposures employing the same photomask, (2) movement of a photomask between successive exposures, or (3) movement of a photomask by an amount corresponding to a pitch between electrodes or a multiple thereof. Thus, Asano's mere disclosure of address electrodes formed at a particular pitch does not render obvious a modification of the cited art that "a photomask and the photosensitive material are moved relative to each other by one or more integral times the distance p between the first and second exposures," as recited in claim 2.

III. The cited art does not suggest slight movement of a photomask between successive exposures

Claim 1 recites, *inter alia*, "a photomask and the photosensitive material are moved relative to each other <u>by a distance less than w</u> between the first and second exposures." Claim 2 recites, *inter alia*, "a photomask and the photosensitive material are moved relative to each other <u>two or more integral times the distance p</u> between the first and second exposures." Claim 12 recites, *inter alia*, "a photomask and the photosensitive material are moved relative to each other in the lengthwise direction <u>by a distance less than p</u> between the first and second exposures." As explained in the application, by performing multiple exposures according to the recited methods, fatal defects conventionally resulting from dust on a photomask can be avoided.

In contrast, where the cited art describes movement of a photomask between exposures, it is by a much greater difference. Peng discloses an exposure system using "a homogenized beam 47 of a size between 10mm² and 50mm²" (paragraph [0021]). Given the small beam size, it is necessary to perform a plurality of exposures to expose the entire area of a liquid crystal display. Accordingly, "movable stage 52 can redirect the pulsed beam 44 to aim it at <u>different</u> target regions on the glass substrate" (Peng, paragraph [0023]) (*emphasis added*) to expose the entire display area. However, Peng does not suggest slight movements of a photomask between exposures corresponding to the subject matter recited in claims 1, 2, and 12. Ashida also does

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not suggest slight movements of a photomask between exposures corresponding to the subject matter recited in claims 1, 2, and 12. Instead, Ashida moves a photomask by a much greater distance between exposures. As discussed above, Asano does not relate to movement of a photomask between exposures.

As the cited art does not render obvious the recited movement of a photomask between success exposures of a position on a photosensitive material, as recited in independent claims 1, 2, and 12, Applicant respectfully requests withdrawal of the rejections of claims 1 and 2, allowance of claim 12, and withdrawal of the rejections of claims 8-10 which depend thereon.

Conclusion

In view of the above remarks, Applicant respectfully submits that the application is in condition for allowance, and respectfully requests the Examiner's favorable reconsideration as to allowance. The Examiner is invited to contact the Applicant's representative listed below.

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To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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